

MEMO ENDORSED

Federal Defenders
OF NEW YORK, INC.

Southern District
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David E. Patton
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USDC SDNY
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Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

November 24, 2020

BY EMAIL AND ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Application GRANTED. The Court adopts Defendant's proposed schedule. The parties must appear for resentencing on **January 28, 2021, at 2:00 p.m.**

SO ORDERED.

RE: United States v. Robert Simmons
08 Cr. 1280 (VEC)

 11/24/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Dear Judge Caproni:

I write on behalf of my client, Robert Simmons, with the consent of the Government, to respectfully request a two week adjournment of the scheduled dates in the above-referenced case.

The Court ordered the defense to submit by November 30 briefing regarding theories of relief to which Mr. Simmons may be entitled given the four-plus years he has spent on pretrial supervision. We need additional time to complete this briefing and gather supporting information. The Court also urged the parties to resume discussions regarding a disposition of this case and we would like additional time to pursue these discussions.

The new schedule would be: Defense briefing due December 14; Government response due December 29; Sentencing submissions due January 14. We would ask the Court to schedule sentencing date for some time after January 14 that is convenient for the Court.

The government consents to this request and to the new dates.

Thank you for your time and consideration of this matter.

Respectfully submitted,

/s/

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